

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

LINDSAY TAYLOR,  
ELAINE TAYLOR, and  
JEFFREY TAYLOR,  
Plaintiffs,

v.

SALVATORE ERNA and  
GODSMACK TOURING, INC.,  
Defendants and  
Third-Party Plaintiffs,

v.

ERIC M. SARGENT,  
Third-Party Defendant.

Civil Action No. 08-10534-DPW

**PROPOSED JURY VOIR DIRE**  
**QUESTIONS OF THE**  
**DEFENDANTS,**  
**SALVATORE ERNA AND**  
**GODSMACK, TOURING, INC.**

The defendants, Salvatore Erna and Godsmack Touring, Inc. (“defendants”), respectfully request that this Honorable Court make inquiry of potential jurors in the trial of this matter as follows:

1. The parties in this case are as follows:
  - a. Lindsay Taylor of Chelmsford, MA, plaintiff;
  - b. Elaine Taylor of Chelmsford, MA, plaintiff;
  - c. Jeffrey Taylor of Chelmsford, MA, plaintiff;
  - d. Salvatore Erna of Windham, NH, defendant;
  - e. Godsmack Touring, Inc., a NH corporation, defendant; and
  - f. Eric M. Sargent, Haverhill, MA, third-party defendant.

Is any member of the jury familiar with any of the parties in this case?

2. The attorneys in the case are as follows:

- a. Andrew M. Abraham, with Baker and Abraham;
- b. Paul Baker, with Baker & Abraham;
- c. Michael W. Gallagher, with Gallagher and Cavanaugh;
- d. Jay V. Lee, with Gallagher and Cavanaugh;
- e. Lee S. MacPhee, with Morrison and Mahoney; and
- f. Roy W. Bjorlin, III, with Morrison and Mahoney.

Is any member of the jury familiar with the attorneys in this case or their law firms?

3. The witnesses in this case are as follows:

- a. Shannon Taylor of Chelmsford, MA;
- b. Cliff Sargent of Plaistow, NH;
- c. Mrs. Lori Barrett of Chelmsford, MA;
- d. Mrs. Maureen White of Londonderry, NH;
- e. Sharon Lamoureux of Pelham, NH;
- f. Cecile Lamoureux of Pelham, NH;
- g. Kelsey Lamoureux of Pelham, NH;
- h. Samantha Wagner of Lowell, MA;
- i. Samantha Stopyra of Tyngsborough, MA;
- j. Sandy Laritieri of Tyngsborough, MA;
- k. Stephanie Jones of Nashua, NH;
- l. Trooper Daniel Doiron of the MA State Police;
- m. Lieutenant Stephen Walsh of the MA State Police;
- n. Captain Kris McCarthy of the Methuen Police Department;
- o. Captain Randy Haggard of the Methuen Police Department;
- p. Deborah Joyce of Chelmsford High School, Chelmsford, MA;
- q. Kathleen Coughlin of Chelmsford High School, Chelmsford, MA; and
- r. Elizabeth Loisell of Parker Middle School, Chelmsford, MA.

Is any member of the jury panel familiar with any of these witnesses?

4. This case involves medical treatment and/or evaluations from the following care providers, medical witnesses, and expert witnesses:

- a. Dr. Mark Jude Tramo of Mass General Hospital;

- b. Dr. Keith Chiappa of Mass General Hospital;
- c. Dr. Heechin Chae of Spaulding Rehab Hospital;
- d. Dr. James Hurst of Beth Israel Deaconess Medical Center;
- e. Sarah Kelly of Northeast Rehab Hospital;
- f. Nancy Krovitz of Northeast Rehab Hospital;
- g. Lisa Hastings of Communicative Health Care Associates, Inc. in Waltham, MA;
- h. Rachael A. Chapman with the Massachusetts Rehabilitation Commission;
- i. Heather Barker, Merrimack Education Center, Chelmsford, MA;
- j. Heather Valcanas, Merrimack Education Center, Chelmsford, MA;
- k. David Faust, Ph.D., Dept. of Psychology, Univ. of Rhode Island, Kingston, RI;
- l. Jane Mattson, Ph.D., Norwalk, CT;
- m. Harold Petersen, Ph.D., Dept. of Economics, Boston College, Chestnut Hill, MA;
- n. Steven R. Benanti of Groveland, MA;
- o. Thomas Deters, Ph.D., Cambridge, MA;
- p. Dr. Paul Caruso, Massachusetts Eye and Ear, Boston, MA;
- q. William Burke, Ph.D., Portsmouth, NH; and
- r. Dana Hewins, Ph.D., Lakeville, MA.

Is any member of the jury panel familiar with any of these doctors, care providers, expert witnesses, or treatment facilities?

- 5. Have you, any member of your immediate family, or a close personal friend, been involved in a lawsuit or claim for personal injuries as either the party bringing the claim or defending against the claim? If so, does that experience affect your ability to be fair and impartial in this case?
- 6. Have you, any member of your immediate family, or a close personal friend, ever had a diagnosed brain injury? If so, does that experience affect your ability to be fair and impartial in this case?
- 7. Have you, any member of your immediate family, or close personal friend ever been diagnosed or had to deal with learning disabilities? If so, does that experience affect your ability to be fair and impartial in this case?
- 8. Do you have any bias against or dislike for people who drive large vehicles like Hummer(s)?

9. Do you have any bias against or dislike for people who are in the entertainment industry?
10. Do you have any bias against or dislike for people who are members of heavy metal rock groups?

Respectfully Submitted,  
The Defendants,

By: \_\_\_\_\_  
Michael W. Gallagher, BBO# 183400  
Jay V. Lee, BBO# 646095  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 10th day of November 2009, I served a true copy of this document through the ECF system, sent electronically to the registered participants as identified on the Notice of Electronic Filing, and paper copies to those indicated as non-registered participants.

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Jay V. Lee, Esq.